

COUDERT BROTHERS

ATTORNEYS AT LAW

1627 I STREET, N.W.
WASHINGTON, D.C. 20006
TEL: 202 775-5100 FAX: 202 775-1168

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GUILLÉN-LLARENA, S.C.

June 10, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Re: Revision of the Commission's Rules to Ensure Compatibility with
Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's Rules, enclosed please find two copies of a letter submitted on June 9, 1998 by Mary Ann Byrnes, President & CEO of Corsair Communications, Inc. This letter was submitted to Daniel Phythyon, Chief of the Wireless Telecommunications Bureau. Copies of this letter were also submitted to the following:

Chairman William Kennard
Commissioner Susan Ness
Commissioner Michael Powell
Commissioner Harold Furchtgott-Roth
Commissioner Gloria Tristani
Mr. Ari Fitzgerald, Office of the Chairman
Mr. David Siddall, Office of Commissioner Ness
Mr. Peter Tenhula, Office of Commissioner Powell
Mr. Paul Misener, Office of Commissioner Furchtgott-Roth
Ms. Karen Gulick, Office of Commissioner Tristani
Mr. Dan Grosh, Wireless Telecommunications Bureau

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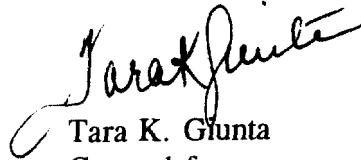
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COUDERT BROTHERS

If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tara K. Giunta".

Tara K. Giunta
Counsel for
Corsair Communications, Inc.

CC: Daniel Phythyon
Chairman William Kennard
Commissioner Susan Ness
Commissioner Michael Powell
Commissioner Harold Furchtgott-Roth
Commissioner Gloria Tristani
Mr. Ari Fitzgerald
Mr. David Siddall
Mr. Peter Tenhula
Mr. Paul Misener
Ms. Karen Gulick
Mr. Dan Grosh

CORSAIR
COMMUNICATIONS

3408 Hillview Avenue
Palo Alto, CA 94304

650.842.3300
fax 650.493.3588

June 9, 1998

VIA MESSENGER

Mr. Daniel Phythyon
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554

Re: Revision of the Commission's Rules to Ensure Compatibility with
Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102

Dear Mr. Phythyon:

By means of this letter, Corsair Communications, Inc. ("Corsair") wishes to offer its views on the proposal advanced by the Ad Hoc Alliance for Public Access to 911 (the "Alliance") to implement a "strongest signal" requirement in the above-referenced proceeding.

Founded in 1994, Corsair is a leading provider of distributed system solutions to the wireless industry. Its PhonePrint fraud prevention system protects over 20 million cellular users in the United States, Mexico, the Philippines, and Malaysia. Corsair's newest product, the PhoneTrack™ system, uses proprietary time difference of arrival ("TDOA") and other technologies to determine the location of wireless devices. PhoneTrack™ forwards location information immediately to emergency services personnel at public safety answering points ("PSAPs"), enabling rapid response to emergency situations. PhoneTrack™ will be available in the United States in 1999, well in advance of the FCC's mandated timeline for deployment of Phase II Automatic Location Identification ("ALI") requirements.¹

Corsair strongly supports the Commission's goal of ensuring the broad availability of E911 services for wireless customers, and believes that assuring the accuracy and reliability of location information is of utmost importance when locating mobile callers in emergency situations. Corsair joins the public safety community and others in opposing the Alliance's strongest signal proposal. While this proposal may initially sound attractive, it in fact does

¹ PhoneTrack™ will offer wireless carriers the ability to identify the latitude and longitude of mobile units making 911 calls within a radius of no more than 125 meters.

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not achieve the Commission's public safety goals.

Corsair believes that the strongest signal proposal may undermine the availability and rapid deployment of ALI technologies, the very cornerstone of the FCC's wireless public safety policy. Deployment of ALI permits public safety organizations to rapidly respond to emergencies, by allowing the immediate dispatch of assistance. ALI reduces the likelihood of errors in reporting the location of an emergency situation, and permits wireless carriers to forward accurate location information to emergency personnel. Imposing a strongest signal requirement at this late date, however, would potentially *delay* the deployment of ALI systems that comply with the Commission's Phase II requirements. Such a delay clearly would not serve the public interest, and may instead prevent public safety organizations and wireless carriers from realizing the benefits of ALI.

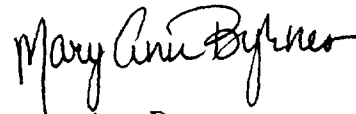
The value of ALI for public safety is unquestionable. Many wireless carriers across the nation are currently undertaking efforts to deploy ALI systems earlier than required. The strongest signal requirement, however, may discourage the marketing incentive for wireless carriers to invest in the early deployment of systems capable of providing ALI to public safety organizations. Thus, such a requirement may be inconsistent with Chairman Kennard's encouragement of wireless carriers during his CTIA '98 speech that E911 requirements be met early.

The strongest signal requirement also undermines the importance of accuracy and reliability of location information, by focusing merely on one aspect -- signal strength. The Commission's policies should ensure that 911 calls are handled by whatever wireless system is available in the area of need at the critical moment the call is placed. The system delivering the strongest signal does not mean it will deliver the most accurate and reliable location information. Further, to foster accuracy and reliability, the FCC should strive to strengthen federal policies on tower siting, in order to address the serious problems caused by coverage gaps. Such policies would ensure that wireless callers in emergency situations can be assured that their 911 calls will be received and handled by the appropriate public safety organizations.

For all the reasons given above, Corsair urges the Commission to reject the Alliance's proposal to implement a strongest signal requirement. Adoption of such a requirement at this late date would thwart the prompt and timely deployment of valuable E911 location systems, and may be detrimental to the FCC's public safety goals. To safeguard these goals, the Commission should continue to require that wireless carriers meet Phase II requirements by the 2001 deadline and not introduce any further requirements which may delay this deadline from being met by wireless carriers.

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Sincerely,

A handwritten signature in black ink, reading "Mary Ann Byrnes". The signature is fluid and cursive, with the first name "Mary" and last name "Byrnes" clearly distinguishable.

Mary Ann Byrnes
President & CEO
Corsair Communications, Inc.

Copy: Chairman William Kennard
Commissioner Susan Ness
Commissioner Michael Powell
Commissioner Harold Furchtgott-Roth
Commissioner Gloria Tristani
Mr. Ari Fitzgerald
Mr. David Siddall
Mr. Peter Tenhula
Mr. Paul Misener
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